

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

<b>In the Matter of</b>	)	
	)	
<b>Amendment of Part 97 of the Commission's</b>	)	<b>RM-10806</b>
<b>Amateur Service Rules to Eliminate</b>	)	
<b>Morse Code Testing</b>	)	
	)	
<b>To: The Commission</b>	)	

**COMMENTS TO THE PETITION**

I disagree with the petition inasmuch as the petitioner seems not to understand the reason for Morse testing and why it is or is not of relevance to the Amateur Service. The retention of Morse Code testing for any class of Amateur Radio license serves no apparent purpose, and all such testing should be eliminated at the earliest opportunity.

**BACKGROUND**

**Why was a telegraphy skill requirement for an Amateur Radio operator license needed at all?**

In the first days of radio, every station, be it Commercial, Military, or Amateur, all used “spark” transmitters. By their very nature, spark generated signals are very wasteful of spectrum space, and interference between users is difficult or impossible to avoid. The basis of the requirement for an Amateur licensee to demonstrate skill in sending and receiving Morse code signals was to insure that they (the Amateurs) could understand instructions to stand by or cease operating if they were interfering with important communications from government or military stations. This was of particular importance in life threatening situations.

Also, as it turned out, it was useful to have a “pool” of operators trained in the use of manual telegraphy in the event of war. Such individuals were of prime interest to the military for many years. Indeed, in both WW1 and WW2, Amateur radio operators were sought by the military for their communications skills.

**THE SITUATION TODAY**

**Morse code skills are no longer required for either of the original reasons.**

The primary reason for insuring that Amateur Radio operators could understand and reply using Morse code has disappeared. Modern radio systems are sufficiently capable of rejecting interfering signals, so much so

that mutual interference is a non-issue. The use of narrow band signals, improved engineering practice, and modern spectrum management have made the issue obsolete.

Military, government and commercial uses of Morse code have declined or completely disappeared. While our military still uses some specially trained “intercept operators” to gather intelligence from Morse code signals of other countries, the use of Morse by our own forces has ceased. Modern signal encryption and processing techniques, together with the type and quantity of information being transmitted make the use of Morse code inadequate for the task. Therefore, its use has ceased. The same situation is true for other government and commercial users. Other than the Amateur service, no other service has a present requirement for, or interest in, the use of Morse code.

#### **Morse code skills do not make a “better” Amateur Radio operator.**

Morse code testing has been removed as a requirement for the Technician class Amateur Radio license for some years now. There have been no indications of a measurable increase in illegal activities on the Amateur bands at VHF and higher frequencies. The percentage of illegal and questionable operations by Amateur Radio licensees, code free license or not, while regrettably not zero, remains very small, according to comments by Riley Hollingsworth, of the FCC’s enforcement division. There is no reason to expect that granting of code-free licenses for HF access would result in an increase in illegal operation or be in any way different from the VHF experience.

#### **Amateur Radio emergency communications and the Morse code.**

The petitioners argument that Morse code is of primary importance for emergency communications is obsolete and essentially baseless. He states that “time and time again, we hear reports . . . . of ham operators were providing the only communications following a disaster”. While this is true, he neglects to mention that essentially all of these communications are accomplished using voice or “keyboard” transmissions, in many cases on the VHF bands. In disasters involving hurricanes and similar issues, the FCC frequently sets aside specific frequencies on the HF voice bands, but only very rarely for the CW bands. The fact that, in the petitioners own words, he considers Morse code to be “an art form”, and a “beloved method of communication” has absolutely no relevance to efficient and timely communications, particularly given consideration of advances in technology. We have satellites, repeater stations, packet radio, and more, most of which were not available until relatively recently. In emergencies, anyone can use a microphone or a keyboard. The same is not true of a Morse code set.

#### **Amateur Radio Operators will continue to use Morse code by preference.**

As with any number of other skills, if an operator in the Amateur Radio service finds he or she has a need for the advantages offered by use of Morse code transmission, they will undertake to learn the skills required. It is obvious that Morse code transmissions have a clear advantage over other modes in certain situations. The requisite hardware is easier to design and assemble, at less cost. Morse code signals require less bandwidth than almost any

other operating mode, and therefore are preferred for many types of weak signal work. Likewise, many operators in other countries use Morse code, the reasons being mostly economic in nature, but also because of the proven effectiveness of this mode. However, all this being said, there remains no legal or technical reason for applicants to demonstrate the skill as a prerequisite to obtaining a license, at whatever level. Morse code is a skill, nothing more. Those with interest and a reason to learn the code will do so. Other individuals who have no interest in the mode gain nothing by being forced to learn or demonstrate a skill for which they have no use.

### **SUMMARY**

I favor terminating the telegraphy skill requirement for all classes of Amateur Radio licenses, including the removal of Element 1, as defined in sections § 97.501(a) and (b) of the Commission's rules. I also favor an immediate end to testing for Morse code skills, as defined in section §97.503(a) of the Commission's Rules. I also favor the immediate granting of "Technician Plus" privileges to all existing Technician class Amateur Radio licensees.

### **Personal information**

I joined the ranks of Amateur Radio licensees with a Novice license in 1959, and have been licensed continuously since that time. I have held an Amateur Extra Class operator license since August of 1976. I have also held a FCC Commercial radio operator license since 1963, originally a First Class Radiotelephone, with Ship Radar and Aircraft endorsements, it was modified to a General Radiotelephone Operators License when all such licenses were converted several years back. I am a life member of the American Radio Relay League (ARRL) and the Vice Chairman of the National Conference of Volunteer Examiner Coordinators (NCVEC).

Respectfully submitted,

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